

Approved, SCAO

Original - Court  
1st Copy- Defendant2nd Copy - Plaintiff  
3rd Copy -ReturnSTATE OF MICHIGAN  
THIRD JUDICIAL CIRCUIT  
WAYNE COUNTY

## SUMMONS

CASE NO.  
20-012736-NO  
Hon.Patricia Perez Fresard

Court address : 2 Woodward Ave., Detroit MI 48226

Court telephone no.: 313-224-5173

Plaintiff's name(s), address(es), and telephone no(s)  
Farhat, Youssef

v

Defendant's name(s), address(es), and telephone no(s).  
Target Corporation

Plaintiff's attorney, bar no., address, and telephone no

Kujtim Sulolli 58798  
17000 W 10 Mile Rd Ste 200  
Southfield, MI 48075-2902

**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

**Domestic Relations Case**

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

**Civil Case**

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☐ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ \_\_\_\_\_ Court,

where it was given case number \_\_\_\_\_ and assigned to Judge \_\_\_\_\_.

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

## SUMMONS

**NOTICE TO THE DEFENDANT:** In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date  
9/29/2020Expiration date\*  
12/29/2020Court clerk  
Charlene Pearson

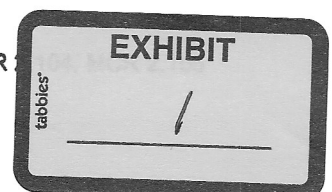
Cathy M. Garrett- Wayne County Clerk.

\*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

MC 01 (9/19)

SUMMONS

MCR 1.109(D), MCR 2.102(B), MCR 2.103, MCR



**SUMMONS**  
Case No. : 20-012736-NO

**PROOF OF SERVICE**

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

**CERTIFICATE / AFFIDAVIT OF SERVICE / NONSERVICE**

☐ **OFFICER CERTIFICATE**

OR

☐ **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult, and I am not a party or an officer of a corporate party (MCR 2.103[A]), and that: (notarization required)

☐ I served personally a copy of the summons and complaint.

☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint, together with \_\_\_\_\_

List all documents served with the Summons and Complaint

\_\_\_\_\_ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled \$	Fee \$	
Incorrect address fee \$	Miles traveled \$	Fee \$	Total fee \$

Signature \_\_\_\_\_

Name (type or print) \_\_\_\_\_

Title \_\_\_\_\_

Subscribed and sworn to before me on \_\_\_\_\_, \_\_\_\_\_ County, Michigan.

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Signature: \_\_\_\_\_

Deputy court clerk/Notary public

Notary public, State of Michigan, County of \_\_\_\_\_

**ACKNOWLEDGMENT OF SERVICE**

I acknowledge that I have received service of the summons and complaint, together with \_\_\_\_\_

Attachments

\_\_\_\_\_ on \_\_\_\_\_  
Day, date, time

\_\_\_\_\_ on behalf of \_\_\_\_\_



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STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

YOUSSEF FARHAT,

Plaintiff,

vs

Case No.: 20- NO  
Hon.:

TARGET CORPORATION, a foreign  
Corporation,

Defendant.

\_\_\_\_\_  
TIM SULOLLI P58798  
RONITA BAHRI P79214  
Goodman Acker, P.C.  
Attorneys for Plaintiff  
17000 W. Ten Mile Road, 2<sup>nd</sup> Floor  
Southfield, Michigan 48075  
(248) 483-5000  
tsulolli@goodmanacker.com  
rbahri@goodmanacker.com  
\_\_\_\_\_

THERE IS CURRENTLY NO OTHER CIVIL ACTION ARISING OUT OF THE  
SAME TRANSACTION OR OCCURRENCE AS ALLEGED IN THIS COMPLAINT  
CURRENTLY PENDING OR PREVIOUSLY FILED WITH THE COURT.

**COMPLAINT**

NOW COMES Plaintiff, Youssef Farhat, by and through his attorneys,  
GOODMAN ACKER, P.C., and for his COMPLAINT against Defendant, Target  
Corporation, states unto this Honorable Court as follows:

1. That Plaintiff, Youssef Farhat, is a resident of the City of Dearborn,  
County of Wayne, State of Michigan.



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2. That Defendant, Target Corporation (hereinafter "Target"), is upon information and belief a Foreign Corporation duly authorized and licensed to do business in the State of Michigan, conducting business in Wayne County and having as their registered agent The Corporation Company, 40600 Ann Arbor Road, Suite 201, Plymouth, Michigan 48170.
3. That this cause of action arises out of a slip and fall that occurred on Defendant Target's premises located at 15901 Ford Road, Dearborn, Michigan 48127.
4. That the amount in controversy herein exceeds the sum of Twenty-Five Thousand (\$25,000.00) Dollars.
5. That on or about July 8, 2020, Plaintiff, while lawfully walking upon a common area of the aforescribed premises, specifically, while carefully walking in a store aisle way, did slip and fall violently to the ground with great force and violence as the result of a puddle of a liquid believed to be water on the floor.
6. That Defendant Target, herein had a duty to exercise due care and caution for the health and well-being of persons lawfully upon the premises, including and more specifically, Plaintiff, and further, had the duty to maintain aforesaid premises and the subject aisle way of said premises in a safe manner and to warn invitees of any dangerous conditions then and there existing and to remove any

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dangerous conditions then and there existing, and to obey the common laws of the State of Michigan.

7. That notwithstanding the duties imposed upon Defendant Target herein by statute and common law, Defendant did violate said duties and was negligent in the following acts of negligence and/or omissions.
  - a. By negligently failing to exercise due care to protect Plaintiff against the hazards arising in the existence of a liquid believed to be water on the floor of said premises;
  - b. By failing to exercise due care and caution in the inspection of the premises to ascertain the presence of liquids on the floor in obvious disregard for the safety, health and well-being of the public, and more particularly, Plaintiff herein;
  - c. By failing to exercise ordinary care and prudence to render the premises reasonably safe for invitees, more particularly, Plaintiff;
  - d. By failing to correct a dangerous condition on the premises, to wit: a liquid believed to be water on the floor of said premises in obvious disregard for the safety, health and well-being of invitees, more particularly, Plaintiff;
  - e. By failing to warn Plaintiff of said condition when the Defendant knew or should have known in the exercise of reasonable care that the liquid posed an unreasonable risk to invitees; and
  - f. By commission of other acts of negligence and/or omissions, which are hereby reserved for proof at the time of trial.
8. That notwithstanding said duties and obligations and as a direct and proximate result of the negligence of Defendant Target, Plaintiff was caused to slip and fall causing him to sustain severe, permanent and progressive personal injuries as hereinafter set forth more fully.



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9. That as a further direct and proximate result of the acts of negligence and/or omissions of Defendant herein, Plaintiff sustained severe, permanent and progressive injuries including, but not limited to, the following:
  - a. Left hip fracture requiring hip replacement surgery;
  - b. Contusions and abrasions;
  - c. Severe shock, fright and mental anguish;
  - d. Pain and Suffering;
  - e. Further injuries which have not yet been diagnosed or manifested themselves.
  - f. Further, that said injuries have necessitated hospital care and treatment, physical therapy, use of rehabilitative appliances, medications and/or other rehabilitative aids.
10. That as a further direct and proximate result of the acts of negligence and/or omissions of Defendant Target, Plaintiff has been required to incur substantial sums of money for the reasonable and necessary medical care and treatment described above in an attempt to alleviate and cure himself of the pain, discomfort, mental anguish and permanent injuries sustained by him in the hereinbefore described incident, and that he will continue to do so into the future.
11. That as a further direct and proximate result of the acts of negligence and/or omissions of Defendant, Plaintiff is and will be unable to participate in those activities which a normal and healthy individual

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in the same or similar circumstances could have participated in but for the injuries sustained in the before described incident.

12. That in the event Plaintiff was suffering from any other medical and/or emotional conditions, then and in the event, Plaintiff claims that those conditions were precipitated, aggravated and/or accelerated by reason of the foregoing incidents.

WHEREFORE, Plaintiff prays for judgment against Defendant Target in an amount in excess of Twenty-Five Thousand (\$25,000.00) Dollars to which she is found to be entitled, together with interest, costs and attorney fees so wrongfully incurred.

Respectfully submitted,

GOODMAN ACKER, P.C.

/s/ Tim Sulolli

TIM SULOLLI P58798

RONITA BAHRI P79214

Attorneys for the Plaintiff

17000 W. Ten Mile, 2nd Floor  
Southfield, Michigan 48075

Dated: September 29, 2020

